

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ITV DIRECT, INC.,)	Civil Action No. 04-CV-10421-JLT
)	
Plaintiff,)	
)	
v.)	
)	
HEALTHY SOLUTIONS, L.L.C., et al.,)	
)	
Defendants.)	
)	
CAPPSEALS, INC.,)	
)	
Plaintiff-in-Intervention,)	
)	
v.)	
)	
HEALTHY SOLUTIONS, L.L.C., d/b/a)	
DIRECT BUSINESS CONCEPTS; ITV)	
DIRECT, INC.; and DIRECT)	
FULFILLMENT, LLC,)	
)	
Intervenor-Defendants.)	
)	

**PLAINTIFF-IN-INTERVENTION CAPPSEALS INC.'S MEMORANDUM OF
LAW IN SUPPORT OF ITS MOTION TO COMPEL DEFENDANTS
ITV DIRECT, INC. AND DIRECT FULFILLMENT LLC**

EXHIBIT A

THIS DOCUMENT IS NOT ELECTRONICALLY FILED PURSUANT TO CM/ECF ADMINISTRATIVE
PROCEDURE 1-3 DATED OCTOBER 24, 2003 AS IT IS ALREADY ON FILE WITH THE COURT AS
DOCUMENT NUMBER 35